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ABSTRACT

This report by the National Advisory Council on Equalit, of Educational Opportunity (NACEEO) contains the major activities undertaken for 1976 and delineates the recommendations made for that year. The recommendations made are in the areas of legislation, administration and special projects. Two of the 1976 recommendations are: (1) state education agencies should be given the role of operating the Emergency School Aid Act basic, pilot, and NPO programs under a state allocation formula and under administrative procedures similar to that now in effect for Title I of the Elementary and Secondary Education Act and (2) the Commissioner of Education should adhere to the predetermined dates established for receipt and processing of ESAA applications with more uniformity than has been the case for the past three years. A summary of 1976 recommendations and of recommendations of previous years is also provided. Part II of this paper contains the report of the evaluation committee of the National Advisory Council on Equality of Educational Opportunity. The purposes of this report are: (1) to provide NACEEO with a summary statement about the findings of desegregation studies and about the quality of the evaluation undertaken by the System Development Corporation (SDC) in comparison with other evaluations of educational programs, (2) to present verbatim the report of the independent consultant about the reports issued by SDC for Year II of ESAA, and (3) to provide NACEEO with some recommendations for consideration for action which were developed by the Evaluation Committee. (Author/AM)

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NATIONAL ADVISORY COUNCIL ON EQUALITY OF EDUCATIONAL OPPORTUNITY

Report for Calendar Year 1976

March 31, 1977

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Emergency School Aid Fiscal Year 1976 Summary, ESAA and CRA-IV

Activity	Total Application	Total Awards	Amount Requested	Amount Obligation	Average Awards	States Served	% of Demand Funded
ESAA							
Special Projects Bilingual Education	82	32	$ 28,765,134	$ 9,148,450*	285,889	8	31.8%
Educational Television	50	7	45,569,193	8,465,870**	1,209,410	7	18.5%
Special Programs/Projects (Discretionary)	109	75	98,961,327	36,151,990	482,027	40	36.5%
State Apportionment Pilot Projects	251	179	82,048,942	31,920,088***	178,325	36	38.9%
Special Programs/Projects (NPO's)	401	215	59,202,467	17,197,342	79,988	45	29.0%
General Grants to LEAs (Basic Grants)	589	468	298,611,080	140,032,618****	299,215	47	46.9%
Evaluation	N/A	2	N/A	2,150,000	1,075,000	N/A	N/A
Subtotal	1,482	978	613,158,143	245,066,358	250,579	N/A	40%
CRA-IV							
GACs-Type A	27	27	11,100,368	11,100,368	411,125	1 /	100%
GACs-Type B	9	9	3,750,000	3,750,000	416,667	1 /	100%
SEAs-Type A	44	44	8,494,956	5,445,844	123,769	44	64.1%
SEAs-Type B	17	17	2,395,993	1,325,208	77,953	17	55.5%
Institutes-Racial Discrimination	70	16	12,145,763	2,145,548	134,097	14	17.7%
Institutes-Sex Discrimination	20	11	3,214,714	1,109,452	100,859	9	34.5%
Grants to LEAs	102	46	7,534,850	2,148,580	46,708	24	28.5%
Subtotal	289	170	48,636,644	27,025,000	158,971	N/A	55.6%
Grant Total	1,771	1,148	661,794,787	272,209,358	237,013	N/A	---

* Includes $548,450 Transferred to Bilingual Grants Program from Discretionary Grant Program.
** Includes $2,015,870 Transferred to ETV Contracts from Discretionary Grant Program.
*** Includes $83,826 Transferred to Pilot Grant Program from Discretionary Grant Program.
**** Includes $4,083,095 Transferred to fund Regional Basic Grants (Court Orders) from Discretionary Grant Program
1 / All 50 states plus Puerto Rico, Virgin Islands, Trust Territories and American Samoa.

Division of Program Development
Date: October 12, 1976

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INTRODUCTION

The National Advisory Council on Equality of Educational Opportunity was established January 30, 1973. Since that time, it has fulfilled its obligations as mandated, submitting regular interim reports over the three years. Herein is the Calendar Year 1976 Report that consists of a restatement of our previous suggestions along with our current recommendations.

We have been determined, as a Council, to assist the Congress and the administration in the implementation of our national policy in the area of our responsibility. To serve our nation in this capacity has been and continues to be both an honor and a privilege.

We applaud legislation passed for the orderly progress of desegregation in our public schools, and we sincerely hope that our deliberations have aided in the development of meaningful guidelines toward that end.

Gwen R. Awsumb

GWEN R. AWSUMB
Chairman

THE EMERGENCY SCHOOL AID ACT AND FUNCTIONS OF THE NATIONAL ADVISORY COUNCIL

The Emergency School Aid Act (ESAA)* was enacted to provide financial assistance for relieving particular problems associated with public school desegregation and minority group isolation. The specific functions of ESAA are to provide financial assistance:

"(1) to meet the special needs incident to the elimination of minority group segregation and discrimination among students and faculty in elementary and secondary schools;

"(2) to encourage the voluntary elimination, reduction, or prevention of minority group isolation in elementary and secondary schools with substantial proportions of minority group students; and

"(3) to aid school children in overcoming the educational disadvantages of minority group isolation."

The Assistant Secretary for Education, Department of Health, Education, and Welfare, was authorized to implement the Act, and $227,940,000 was appropriated for Fiscal Year 1973 (of which approximately $195,000,000 was obligated); $234,004,000 for Fiscal Year 1974 (of which approximately $236,493,000 was obligated); $215,000,000 appropriated and obligated for Fiscal Year 1975; and $245,000,000 appropriated and obligated for Fiscal Year 1976.

Although appropriations needed for fully implementing the objectives of the Act, as well as for carefully assessing its accomplishments, seem to have increased in time, appropriations have decreased.

*The Emergency School Aid Act (ESAA) was passed in June, 1972 (Public Law 92-318, Title VII) as a successor to the Emergency School Assistance Program (ESAP) of 1970. The Education Amendments of 1974 (Public Law 93-380, Title VI, Section D) authorized continuance of ESAA through June 20, 1976, and Public Law 94-482, Title III, Section 321, authorized continuance of ESAA through September 30, 1979.

The Act mandated the establishment of a 15-member National Advisory Council on Equality of Educational Opportunity (NACEEO), with at least half of the members representing minority groups. The Council has four specific purposes:

"(1) advise the Assistant Secretary with respect to the operation of the program authorized by this title, including the preparation of regulations and development of criteria for the approval of applications;

"(2) review the operation of the program (A) with respect to its effectiveness in achieving its purpose as stated in section 702(b), and (B) with respect to the Assistant Secretary's conduct in the administration of the program;

"(3) meet not less than four times in the period during which the program is authorized, and submit, through the Secretary, to the Congress at least two interim reports, which reports shall include a statement of its activities and of any recommendations it may have with respect to the operation of the program; and

"(4) submit to the Congress a final report on the operation of the program."

MAJOR ACTIVITIES

The major activities consummated during the 1976 calendar year by NACEEO's Subcommittees are as follows:

1) ESAA consumer information meetings held in Dallas, Texas, on June 17-18, and in Detroit, Michigan, on June 28-29.

2) ESAA Special Projects -- On-site reviews of ETV, Special Math, and Bilingual programs.

*3) Evaluation -- Extensive review of all the ESAA Year II evaluation data as presented by System Development Corporation.

4) Conferences -- Participated in the NIE Conference on school law, desegregation, and social science.

5) General Public Meetings -- During 1976, the full Council met in San Francisco, California; Atlanta, Georgia; and Alexandria, Virginia. Each meeting provided an opportunity for local school personnel, interested public groups, and parents to discuss their support, recommendations, and/or concerns about the program. Information gained through Subcommittee activity was discussed with all members at these general meetings, leading to the report herewith being transmitted.

*Specific recommendations are contained in the companion report accompanying this report.

RECOMMENDATIONS
CALENDAR YEAR 1976

A) LEGISLATIVE:

RECOMMENDATION A. 1. State education agencies should be given the role of operating the ESAA basic, pilot, and NPO programs under a state allocation formula and under administrative procedures similar to that now in effect for Title I of the Elementary and Secondary Education Act. The federal government should require a submittal by the state education department of a state equality of education operational plan which would have to be approved by USOE, and the formation of a state EEO advisory council whose members would be appointed by either the governor or the chief state school officer. Civil Rights clearances would still be required from the U.S. Office for Civil Rights. (see Recommendation B. 10. - 1975)

NACEEO believes in the traditional state and local control over education. Under the present language of P.L. 92-318, Title VII, state departments of education are merely given an advisory role to both the local school district and to the U.S. Office of Education. Primary responsibility for the state formula ESAA program is handled exclusively through USOE regional offices. Direct contact between USOE regional offices and local educational agencies is the hallmark of this program.

Along with the growing concern over the rapid expansion of the federal government and its indirect control over educational institutions, NACEEO feels that administrative overhead costs could be reduced by state operation of the ESAA state allocated programs. More importantly, it is our judgment that state departments of education must be held responsible for providing statewide integrated education. State departments of education should not be substantially funded under other USOE federal programs, and then claimed to be untrustworthy when it comes to overseeing civil rights types of educational programs. A violation of Civil Rights statutes jeopardizes all federal aid to education. OCR could maintain jurisdiction over local educational agencies as well as federally funded state units with regard to Civil Rights compliance under this state operational system.

The requirement for states to present an overall equal educational opportunity plan would provide stronger support for desegregation and increased coordination with other state planned educational programs, such as Title I, Vocational Education, and Handicapped. Administrative funds to support state equal educational opportunity units would be needed under this suggested program. Federal regional offices could maintain a small staff of program officers who could be held responsible for the establishment of effective liaison with respective state department personnel and to coordinate the informational dissemination effort. Such a comprehensive equal educational state plan and the establishment of state equal educational opportunity advisory councils would provide additional benefits to the state, even after federal funding participation ends. Mobilization of state educational consultants, combined with the added thrust of an active statewide citizens EEO council, could be a powerful incentive for peaceful settlement of school desegregation issues, thereby avoiding the disruption which has occured in some states.

RECOMMENDATION A. 2a. AND 2b. 2a) The ESAA program should provide for multiple year funding for school districts under the approved state EEO plan. Specific yearly program accomplishments should be required and monitored by state EEO personnel. A federal educational office should conduct yearly evaluations of state EEO performance, while the Office for Civil Rights (HEW) would retain responsibility for Civil Rights compliance. 2b) The extension of multiple year project grants beyond the first project year award should provide for a progressive cost sharing provision. Such a cost sharing provision would provide for a 20% contribution by the local institution or NPO of the total project cost beginning at the fifth year, a 40% contribution during the sixth year, a 60% contribution for the seventh year, and an 80% contribution during the eighth year of receipt of federal funds under ESAA. No grantee would be eligible to receive ESAA funds beyond eight years of program operation.

A. 2a.) One factor of great concern felt by consumers of the ESAA programs is the lack of time between program implementation and proposal submittal. Although recipients of ESAA grants favored the "forward funding" aspect of ESAA, they felt that the present proposal cycle arrangement was not beneficial to either party, as project directors do not have adequate time to evaluate their ESAA program nor USOE to monitor them before it is time to submit new proposals for the next FY year funding. The current "fiscal year" proposal solicitation time lines also produce additional manpower difficulties for the entire USOE regional office personnel, as well as the grantee. Time lines for the fiscal year project implementation phase, USOE monitoring requirements, and the need to give technical assistance to new applicants for an upcoming fiscal year, all fall within a compressed period of 4 months. To make matters worse, with the fiscal year ending on September 30th and beginning October 1st, additional complexities are emerging, particularly as it applies to federal, state, and local staff availability.

Multiple year funding is one form of resolution of this problem. Under a state developed equal educational opportunity plan, a local school district could submit proposals for a "project" year award. Project year awards could be operationally set for two years rather than one fiscal year's duration. As in

other programs utilizing the project year concept, safeguards could be built into the process.

A cursory review of the past three years of funding under ESAA reveals that a high degree of repetitiveness does already exist in the granting of awards. Under the multiple year system proposed here, new LEA's could be funded from the annual appropriations authorized by Congress.

A. 2b.) If the new multiple year project concept is adopted, there should be a progressive local commitment provision written into the Act. If ESAA is not to be considered an entitlement program, local educational agencies must finally accept the burden of the additional cost of programs that are needed and sought to overcome minority group isolation or the effects of past discrimination. It is also reasonable to assume that if the Emergency School Aid Act is to be considered successful, the selection of educational strategies must be employed which do the most toward accomplishing the immediate goals. Under this plan, Congress would be able to foresee the fiscal requirements for the program in various states, affording them the opportunity to make adjustments in the funding ratios. Naturally, an "extenuating circumstances" provision should be written into the regulations whereby the Secretary could provide for additional resources beyond the eighth year if so warranted. The burden already assumed by local agencies is apparent, but the proper utilization of highly specific educational and community activities, under ESAA and other federal sources such as Title I, Right to Read, Bilingual, Ethnic Heritage, Career Education, Vocational Education, etc., should provide the nucleus for resolution of certain conditions which have heretofore been a hindrance to the system. Recent court decisions concerning state formulas for determining educational equity also lead us to believe that it is not unreasonable to consider this type of approach.

RECOMMENDATION A. 3. The separate 8% set-aside state allocation for nonprofit organizations should be deleted and replaced by a provision allowing such funds to be reprogrammed under the basic and pilot set-asides. Language should also be introduced under the authorized activities encouraging school districts to utilize NPO's in providing specific community/school type services under a contractual arrangement. (see Recommendation B. 11. - 1975)

The utilization of community groups to assist school districts in the implementation of desegregation or racial isolation reduction plans is a worthwhile strategy, particularly in the early stages of physical desegregation when the communities are polarized. Organizations of citizens have accomplished much toward the prevention of severe disturbance and violence which could erupt during such a process.

It appears, however, that many nonprofit groups funded under the ESAA program are concentrating their activities in the area of educational remediation. Regardless of the immediate beneficial effects of NPO remediation programs, the long term effect is questionable in terms of cost effectiveness. Particularly in metropolitan areas, the administrative cost of utilizing NPO's in relation to the number of students/adults served seems prohibitive. It is also apparent that if federal funds were not available, the NPO programs would not be incorporated within the framework of tax levy supported programs.

Many of the school administrators interviewed, even those who highly favored NPO's, are inclined to support an administrative change whereby NPO's would not have separate autonomy and funding which they now do under the law. A subcontract relationship between school and NPO might prove to be more acceptable. Most difficulty stems from a lack of real knowledge as to what the nonprofit groups were actually doing for the school district, although ESAA procedures provide for initial review by the LEA of the NPO proposal as well as representation in the NPO's advisory committee. The lack of veto power by eligible districts over NPO activity remains a sensitive issue.

School districts have also been disturbed by the fact that several nonprofit groups can each utilize the district's eligibility standing, statistics, personnel, etc., in their individual competitive bid for ESAA funds. Having a multiplicity of competing nonprofit organizations involved at various levels of the system produces additional burdens on the administrative structure and complicates coordination efforts. This situation has also led to the high administrative costs attributed to NPO operation mentioned earlier, as the consortium idea has not gained the favor anticipated.

For these reasons, it appears that a different arrangement may provide for more efficient utilization of the present set-aside funds. Chances are that a more coordinated, less costly program would result with a genuine carryover possibility if the present diversified activities authorized for nonprofit groups were narrowed in scope to noneducational services and encompassed under the administrative management of the local school system, in light of the primary role of the school in the educative process. In this way we would expect to cut the administrative cost of the NPO program, eliminate the need for a separate advisory committee, while providing better incentive for program design and monitoring. In short, we would expect an increased accountability for NPO activity, while eliminating duplicity and maximizing the utility of NPO service to the school/community.

RECOMMENDATION A. 4. The "unusually promising and innovative" requirement that now exists under the language of the pilot programs should be spelled out much more fully, or deleted in the act and in the regulations.

Review of the educational proposals funded under the "pilot" criteria of ESAA fails to substantiate an "unusually promising" or "innovative" component as being of critical value.

The focus of the pilot program, as legislatively structured, is aimed at providing compensatory educational programs to eligible school districts serving a large number of minority group students. The criteria to be utilized in judging pilot programs under the Act and regulations do not sufficiently provide explicit descriptions of what constitutes "unusually promising", or what is to be considered "innovative". Review of USOE/EEO program guides and panel review critieria for pilot programs also fails to adequately differentiate the "unusually promising and innovative" aspects for this program. In fact, USOE, in its criteria description, goes beyond the language of the Act by implying pilot programs are to be small-scale experimentations. If this were valid, USOE violates its own interpretations by funding and refunding the same projects each year without assessing the experimental nature of the program, nor requiring true experimental designs and methodology to be utilized. It appears that USOE interprets the law to imply that only a "replication" phenomena is critical, and, therefore, additional points are awarded in the scoring for a project's ability to keep a journal of its activities. Yet, review panelists do not, as a matter of routine, have the benefits of this replication feature available to them when the pilot project is again submitted, nor do they have all the USOE monitoring reports.

RECOMMENDATION A. 5. If Title IV of the Civil Rights Act is to continue, it is recommended that a technical amendment to this law provide that the National Advisory Council on Equality of Educational Opportunity, established pursuant to P.L. 92-318, have advisory oversight responsibility regarding the operation and administration of the program authorized under Civil Rights Act of 1964, Title IV.

During the three years of its existence, NACEEO has been concerned with the relationship of the Title IV CRA program and the Emergency School Aid Act. Although we realize that the program is primarily aimed at the adult educational community, the inextricable connection with ESAA clientele or prospective clientele is obvious and unavoidable. For the most part, we have found that, unlike the ESAA program, Title IV is generally less answerable and harder to evaluate in terms of performance in accomplishing the lofty goals stated in the Act.

There appears to be a significant measure of duplication between the General Assistance Center program and the State units, with each offering the same or similar services to the same target groups. The relationship between the Title IV sponsored programs and ESAA clientele were positive, for the most part, but never appeared to be of critical value or necessity to the applicant ESAA agent. In fact, many of the activities which the ESAA applicants were requesting in their proposals were identical to that which were being offered by the federally funded state unit or the general assistance center. Especially in the area of teacher training and curriculum development, the picture becomes even more impervious to recent studies concerning teacher training. Unlike ESAA applicants, the required input by citizen advisory councils, public meetings, and required national evaluations are all missing from the CRA program. The feature of "to serve only when called" contained within the provisions of the Title IV regulations, we believe, also renders the program much less effective.

The newer authorized features of CRA IV dealing with national origin (language) and sex discrimination issues may be where the major directional thrust for this program should lie in the coming year.

Additionally, the same USOE program unit presently administers both ESAA and CRA IV programs and it is difficult for NACEEO to fully evaluate the unit's overall effectiveness with the ESAA program without concerning ourselves with the companion statute, administrative demands, and operational effectiveness. It should be noted also that Congress has seen fit to incorporate both programs under the broad area of Equal Educational Opportunity during its appropriation reviews.

Therefore, because of the present ESAA mandate and ESAA's close connection with the purposes and programs of CRA IV, we feel that NACEEO, which presently is deeply involved with the issue of school desegregation and equality of educational opportunity, should be given advisory oversight responsibility for this program.

B) ADMINISTRATIVE RECOMMENDATIONS:

RECOMMENDATION B. 1. The Commissioner of Education should adhere to the predetermined dates established for receipt and processing of ESAA applications with more uniformity than has been the case for the past 3 years.

In 1974, 1975, and 1976, the U.S. Commissioner administratively extended the deadline for receipt of ESAA proposals beyond that which was originally published in the Federal Register. It appears that every year one or more clients are unable to meet the deadline date due to what USOE classifies as "mitigating circumstances". Although one can understand normal delays caused by planes, trains, or taxi cab schedules, we feel that the government has, in every year except for 1975, provided sufficient lead time for the development and submittal of ESAA proposals. The repetitiveness of a large number of grantees seeking funds from year to year also speaks to the question that there is sufficient knowledge among the applicants of the time lines involved in the grant process. The specifics as to whether the late offenders were more often school districts or nonprofit groups is difficult to ascertain. We were informed at one time that the problem lay at the regional offices. That is, officials at respective locations did not adhere to uniform procedures regarding the closing times, or that Federal Register notices were not specific as to what constituted lateness.

Regardless of the past reasons for such action, NACEEO feels that after three years USOE should have stabilized its procedures to prevent such extensions being granted as routinely as they have been. Severe extenuating circumstances should be the only tolerated reason for the acceptance of a late proposal and it should be accepted without the necessity of extending the deadline for the whole universe of ESAA applicants or extending it for one month or more, as has been the practice.

RECOMMENDATION B. 2. USOE should develop a policy outlining the specific activities that can be provided by nonprofit organizations especially if they are to continue under the present legislative 8% set-aside arrangement. These activities should be limited in scope and show a cost effective relationship as they apply to the administrative overhead of operating such programs.

NACEEO feels that the 8% set-aside provision for the Nonprofit Organizations (NPO) program should be eliminated in favor of a subcontractual arrangement with eligible school districts, even though we are aware of Congressional concerns for NPO independence.

Therefore, if the program remains the same, NACEEO strongly recommends, either through administrative leadership or legislative amendment, that the activities set forth in the regulations be revised. NPO proposals should be concerned with community relations activities and not with the educational remediation of the school age population in the school district whose plan they are supporting.

USOE should develop a new administrative posture concerning the growing proliferation of NPO groups applying for funds to help implement the desegregation plans of one school district. A situation could exist whereby a school district, which merely reduced the percentage of minority group children attending one, two, or even three out of possibly twelve schools from a high of 80% to 75%, could hypothetically have four NPO organizations applying for funds aimed at helping the school district with its plan. The concept we are trying to present becomes somewhat clearer if you add to our hypothetical situation that the district took such action to reduce its minority group isolation somewhere in 1970 and has received funds under CR. IV, ESAP, and ESAA since that time.

San Francisco School District, which admittedly is quite large in population but not in geographical area, has at least seven active NPO's serving it. To further illustrate, let us point out that over the past ten years, 1965 to

1975, San Francisco has received as a result of the Emergency School Aid Act and Title IV of the Civil Rights Act nearly $12 million. It was the recipient of seven ESAA awards alone. Other local education agencies in other areas of the country show a similar pattern. In fact, during the same time span, over 70 local educational agencies have received more than $2 million in grant aid and 19 have received well over $5 million. This does not take into account the awards made as of October, 1976, for school year 1976-1977.

USOE definitely needs to undertake a systematic review of the activities being performed by NPO's universally, and attempt to ascertain the effectiveness of each category of activity. As it now stands, nonprofit organizations can utilize activities ranging from pre-school programs to adult basic education programs. We are concerned that the activities undertaken have a direct cause/effect relationship with the stated desegregation plan, and not be utilized for purely educational enrichment purposes.

RECOMMENDATION B. 3. USOE/EEO should undertake the development and publication of a new set of ESAA program manuals that would be disseminated to both ESAA and prospective ESAA clients. We recommend such guideline manuals be produced for each specific program authorized under the Emergency School Aid Act.

From what information was available to this Council, it appears that USOE has not substantially revised its original 1973 ESAA program manuals, nor devised new ones covering some of the discretionary special set-aside programs (art, math, student concerns, and other special programs). Although there appears to exist administrative manuals for all components of the ESAA program, it seems to this Council that they were generally written for federal program officers for their general proposal processing and monitoring activities.

NACEEO feels that the "Comprehensive Manual for Local Educational Agencies", revised September, 1973, and the "Manual for Nonprofit Organization Grant Applicants", revised April, 1975, along with the recent "Guidelines for ESAA-TV Programs", February, 1976, are a good beginning. However, in the light of three full funding years of operation, NACEEO believes there is a need to expand on the information and update the manuals due to various changes in the legislation and, more importantly, due to what has been learned about the ESAA program. We would envision manuals not only helping applicants with the proposal development by providing forms completion type of information, but providing additional data and leads which have come about through the evaluation studies performed on the program. Sections dealing with postaward responsibility, especially as it pertains to administrative regulations applicable to all federal programs, travel, and other contractual requirements that would aid the grantee in management of the program would be helpful.

It would also seem a worthwhile idea to include in these manuals an organizational flow chart designed primarily for use by nonfederal organizations. The chart should outline the various levels of responsibility for the program beginning at the headquarters level to the regional offices with special

emphasis on the relationship between the Office for Civil Rights and the Office of Education at these levels. Site visitations to various projects seem to indicate that this more comprehensive program guideline manual is needed by the consumers of the ESAA program and would improve their overall knowledge of what is expected of them and what they can expect from the USOE.

RECOMMENDATION B. 4. The Office of Education should experiment with the usefulness of a two-part application proposal package. Local education agencies would submit their statistical eligibility and assurance data as a separate section from the actual educational proposal for which they are seeking funds. This would prevent a costly duplication of material in event that said client would have to resubmit their educational proposal.

Discussion throughout this year with USOE personnel, as well as school officials, leads NACEEO to believe that steps should be taken to further standardize the proposal application process.

It does not appear that USOE has any firm uniform procedure throughout the ten regional offices regarding the format or the design of the proposals. We have seen an array of proposals ranging from bound copies with photographs, to two-volume loose leaf books, to stapled pages. Although there does not appear to be any legal grounds for requiring more uniformity in proposal structure, we feel that it would be beneficial, not only to USOE personnel but to the prospective grantees. Paper size, format of presentation, and binding instructions could improve the general readability of proposals and speed up the entire process.

We are also suggesting that two separate sections be submitted. The first section would be the application data containing the required forms, assurances, statistical information, etc., in a precise order. The second section would contain the actual program narrative with an appendix to contain all the supporting data. In so doing, we feel that with this uniform structure, clients required to resubmit due to educational quality criteria need only to resubmit a revised educational proposal for the funds they are seeking and not be concerned with reproducing statistical data, application forms (except for a new commitment by advisory council and superintendent), nor even the appendix with the educational backup material unless warranted by the panel comments.

RECOMMENDATION B. 5. Severe changes in a panel rated education proposal due to budget negotiations with the Office of Education should be submitted to an internal review panel prior to the issuance of the final award document by USOE. This would insure that said proposal would have attained the score attributed to it by the original nonfederal panel had such proposal been presented in the negotiated form.

In this highly competitive program where a .5 difference could decide between being funded or not, NACEFO suggests additional safeguards be initiated in the proposal process.

Review of a small sample of ESAA grants, combined with discussions with local ESAA grantees, suggests a need to investigate the possibility that proposals which undergo significant programmatic changes either in scope or magnitude of deliverable services be reexamined to ascertain whether or not the negotiated program proposal would have scored as high in its present changed scope or magnitude of program elements as the originally reviewed proposal.

We would suggest that USOE consider establishing an internal review panel at each regional office which would be empowered to study each revised proposal prior to final recommendations to the Commissioner for approval in order to determine whether or not the proposal must be resubmitted for consideration and scoring by a nonfederal panel.

RECOMMENDATION B. 6. Nonpublic schools that are eligible to receive services should be required to submit the necessary statistical and assurance data along with an educational proposal to the public school district from whom they expect to receive educational services provided for under the ESAA funding. Review panelists should be given the opportunity to evaluate the nonpublic schools' request for services as a companion proposal to the school district proposal, regardless of the fact that no points either for or against the public school district would result from such a review.

The Congressional mandate providing for allowable educational services to be given through ESAA eligible school districts is quite clear. Discussion with ESAA school personnel and former ESAA review panelists has convinced NACEEO to suggest the possibility of a new administrative format regarding the nonpublic school participation in the program. As it now stands, the service required by eligible nonpublic schools is somehow informally transmitted to the local public school that is developing the ESAA proposal. According to some sources, there are times when the public school, without consultation, merely estimates the needs of the nonpublic school's staff and student body or mathematically assigns a certain percentage figure to be added to their developing budget to cover the cost of any service that the nonpublic school might require.

These methods do not appear to be fully meeting the intent of the Act. To illustrate further, there does not appear to be any formal procedure for addressing the specific need requirements of nonpublic schools during the budget negotiation process. Usually, it appears that a percentage formula is applied by the public school district after the finalization of its award from USOE.

NACEEO feels that it would be beneficial to understand the needs and educational funding requirements of the nonpublic school as a separate entity. There may be instances where the services to the nonpublic school would not need to be adjusted, although the panel requires extensive reappraisal of the public school proposal and/or budget.

RECOMMENDATION B. 7. Monitoring reports by federal and/or state ESAA program officers on all ESAA programs should be made a required part of the proposal review process. This could be done by several means such as a scoring system devised by headquarters and utilized by field personnel with the score being transmitted to the panel or somehow utilized in the final statistical calculations, or by providing the panelists with the formal monitoring reports by program officers. Equitable scoring arrangements should be developed by USOE as new applicants competing for funds would lack such monitoring scores.

A serious concern of NACEEO has been the proper utilization of the scarce ESAA funds. We, therefore, feel quite strongly about the need for monitoring, evaluation, and accountability. The present USOE proposal review processing does not adequately take into account these facets of good management. To our knowledge, there is no way for an ESAA nonfederal panel review group to adequately and routinely ascertain the performance of a school district, nonprofit organization, or state department of education as it pertains to past ESAA program awards. Hypothetically, it appears that a former ESAA grantee with a poor administrative and program accomplishment record for one fiscal year could easily be funded under the forward funding feature of ESAA for a new fiscal year. Even agencies involved in significant audit exceptions or failure to comply with USOE administrative regulations could receive an award.

More important perhaps than even the administrative features is the lack of standardized evaluation criteria. The review panelists are not presented with some form of objective appraisal of projects they are reviewing. Perhaps the system of fiscal year to year funding prevents the efficacious use of adequate monitoring data or it may be within the nature of the competition that the use of such data is prohibited.

Under the "project year" program, we do not feel that scoring equity would be an issue. Even under the present arrangement, however, NACEEO feels that USOE has not taken any positive action to make educational accountability a meaningful factor in the grant award process.

RECOMMENDATION B. 8. ESAA application, receipt, and processing procedures should be reviewed with the intention of providing a different form of competitive levels. Under a state plan framework, the in-state competition for funding could be on the basis of:

A) Nature of Eligibility:
   1) Court ordered desegregation
   2) Voluntary elimination or reduction of racial isolation
B) Size of District:
   1) Large
   2) Medium
   3) Small
C) Date of Final Phase of Plan:
   1) Future years
   2) Within past 8 years
   3) Within the last 10 - 15 years

NACEEO shares the concern expressed by members of the educational community that the present trends indicate there will be more ESAA applicants than funds available. Many individuals have expressed anxiety over the "quantitative" scoring criteria utilized to ascertain "needs". Although the scoring system appears adjusted to take into account small and large school populations and degree of desegregation and/or racial isolation, large urban districts with fairly high percentages or number of minority students do have the numerical score advantage over smaller school districts. A similar phenomena exists with regard to nonprofit groups as they utilize the statistics (enrollment figures and reduction counts) of the school district they are supporting.

Analysis of the grant awards from 1965 through 1975 as it pertains to ESAP and ESAA suggests that the most successful districts in receiving grants year after year under these programs seem to be large urban school systems. Again, it is interesting to note that the majority of school districts receiving well over $2 million during the same course of time were large urban school districts. Although this may not be in itself surprising, it does suggest that these applicants do have a decided advantage when it comes to tabulation of the total score. The shear weight of numbers as an indication of need may be

justifiable. However, even with a lower educational score (although within the established minimum range), a larger district might stand a better chance of being funded than a smaller district with a much better educational quality proposal.

RECOMMENDATION B. 9. Regional offices throughout the country should routinely receive complete samples of all programs currently produced under the ESAA educational television set-aside. Furthermore, USOE regional offices should be regularly supplied with complete program information concerning all applicants for national ESAA funding as well as complete program information throughout the project year on all nationally administered programs within their jurisdictional boundaries.

NACEEO members during their site visits did not feel that regional EEO personnel were sufficiently knowledgeable of the special programs and projects currently operated from national headquarters. This was particularly true as it applies to Student Special Concerns, Arts, and the availability and content of ESAA TV programs. In this last regard, some of the federal personnel did have printouts from the ETV staff concerning to some degree the program content, but they did not appear to know the mechanism for securing same nor could they personally relate to the programs. This lack of knowledge was even more pervasive among state EEO units, local educational agencies, and among nonprofit groups.

We, therefore, feel that a more concentrated effort is needed by USOE to publicize the content availability of programs produced under ETV. With regard to Student Special Concerns and the Arts program, although these do not have the tangible products so clearly available perhaps as the ETV program, whatever information is available pertaining to their results or "model" features should be given wider distribution in the field.

It is evident that the regional offices are not being properly utilized when it comes to the special projects area under ESAA. Program officers should be better prepared to offer technical assistance and, more importantly, disseminate up-to-date information to all regional clientele when it comes to the entire ESAA program. This is not the case. In fact, we believe that the mandates contained in P.L. 93-380 which apply to delegating to regional offices the technical assistance and information dissemination role are added reasons

for revising the present lax communication linkage between USOE headquarters and the regions.

Samples of each educational television production produced under ESAA should be housed at each regional office. Frequent presentations of this material should be undertaken by USOE regional personnel at ESAA informational meetings, training seminars, etc. Such material should be available throughout the year on a loan basis to ESAA clients and other school personnel for their utilization.

Combined site reviews by USOE headquarters and regional personnel should become a requirement of the monitoring activity for the Student Special Concerns, Math, and Arts programs.

SPECIAL PROJECTS:

C) ETV:

RECOMMENDATION C. 1. The U.S. Office of Education should concentrate on developing means to disseminate and promote the programs that are being funded under the ESAA TV portion of the Act. The Commissioner should consider setting aside funds under his discretionary authority for the purpose of developing a national dissemination and promotion campaign for the various ETV programs, or by administratively allowing for more financial support in the dissemination category in individual ETV proposals.

RECOMMENDATION C. 2. The U.S. Office of Education should intensify its review of equipment cost as it relates to the ETV productions, thereby avoiding duplication of expensive equipment being purchased under various federal and nonprofit programs. Purchase of expensive camera chains or related capital equipment should be authorized only under extreme justification.

RECOMMENDATION C. 3. The Commissioner of Education should insure that the regional offices of said agency are equipped to provide effective technical assistance and dissemination activity for this program. The primary focus at the regional level could be one of helping school districts gear their systems to employ the programs that will be produced by the contracts awarded at the national office.

RECOMMENDATION C. 4. A further study of the effectiveness of the ESAA ETV program and the accomplishment of the intended purpose, as set forth in the statute, should be undertaken on a national scale.

D) SPECIAL MATH:

The special math programs appear to be so specialized that there is a concern that the long-range effects of such isolation between this program and the regular school program could be counterproductive. NACEEO, therefore, recommends:

RECOMMENDATION D. 1. That there be established a requirement specifying a teacher training component as a counterpart to any specialized math program. This teacher training should be geared toward the utilization of effective techniques with the faculty already at the respective schools within the program.

ReECOMMENDATION D. 2. In order to prevent a self-perpetuating type of special projects behavior from occuring in particular school districts, there should be a requirement through which the

school district submits a plan specifying how it intends to incorporate the special math techniques within its present operational structure as financed through its own funding.

RECOMMENDATION D. 3. An independent national evaluation of the effects of the math program should be undertaken in order to ascertain the cost effectiveness in relationship to other programs funded under the Emergency School Aid Act.

E) SPECIAL ARTS:

The overall impression of NACEEO in regard to this program as it is presently in operation is that there is a growing alienation between the members of the local school district and the local sponsored grantee. NACEEO, therefore, recommends:

RECOMMENDATION E. 1. The Commissioner of Education should consider the formula in which the school districts that are participating in the special arts projects would submit a plan specifying a phasing out of the project's activity within the school budget over a period of time.

RECOMMENDATION E. 2. An evaluation of the cost effectiveness and the impact of the special arts projects should be ascertained as soon as possible.

F) SPECIAL STUDENT CONCERNS:

The need for investigating and resolving conflict between faculty and students is always a worthwhile endeavor. Such need is heightened under a process of desegregation and takes on much more significance. Therefore, NACEEO feels that the following recommendations be given careful consideration.

RECOMMENDATION F. 1. The Commissioner of Education should expand this particular special discretionary program.

RECOMMENDATION F. 2. The U.S. Office of Education should hold a national two-day conference based on the issues of special student concerns under a desegregated school system no later than June 30, 1977.

RECOMMENDATION F. 3. The results of the projects that are presently under ESAA funding and the information developed as a result of the national conference should be made available to interested agencies, school districts, and individuals throughout the country as soon as possible.

G) NACEEO further recommends:

RECOMMENDATION G. 1. The Commissioner of Education should allow school officials responsible for the ESAA grant project submitted to the Office of Education for evaluation to be present during the panel evaluation of their application for funds. This departure from the normal operation of the Office of Education in reviewing the ESAA program is justified by the geographical and political uniqueness of the areas such as Puerto Rico, Guam, Samoa, and the Virgin Islands.

RECOMMENDATION G. 2. The Commissioner of Education should change Section 185.94-1(d) of the regulations which restricts the grantees or prospective grantees under this program to the provisions of Sections 185.12(b), (c), and (d). Again, due to the social, economic, political, and geophysical consideration, the restricting language should be deleted and the applicants allowed to seek more financial aid for planning, minor remodeling, and alteration of facilities than that which is allowed under the 10% ceiling presently in the regulations under Section 185.12. (see Recommendation B. 5. - 1975)

H) With regard to Special Projects overall, NACEEO recommends:

RECOMMENDATION H. 1. The transitional features of special projects should be emphasized so that the experimental and/or demonstration aspect of the projects will be highlighted and districts will not begin to feel that these projects have become a way of life for them.

RECOMMENDATION H. 2. That special projects, excluding ETV, be for limited duration so that they do not become self-perpetuating.

RECOMMENDATION H. 3. That there is a need for more evaluative activity to be undertaken, especially with regard to the cost effectiveness of the various programs that are authorized to be funded under the umbrella of the Emergency School Aid Act.

RECOMMENDATION H. 4. The regional office personnel of the Office of Education should be provided with specialized training in order to enable them to give technical assistance in the area of all the various programs under the Special Projects portion of the Emergency School Aid Act. Included also would be an active role in information dissemination of the products currently available under the Emergency School Aid Program, such as the educational television products.

RECOMMENDATION H. 5. The Commissioner of Education should reappraise on a yearly basis all of the discretionary programs that have been authorized before automatically continuing the programs for another year.

SUMMARY OF 1976 NACEEO RECOMMENDATIONS

State education agencies should be given the role of operating the ESAA basic, pilot, and NPO programs under a state allocation formula and under administrative procedures similar to that now in effect for Title I of the Elementary and Secondary Education Act. The federal government should require a submittal by the state education department of a state equality of education operational plan which would have to be approved by USOE, and the formation of a state EEO advisory council whose members would be appointed by either the governor or the chief state school officer. Civil Rights clearances would still be required from the U.S. Office for Civil Rights.

a) The ESAA program should provide for multiple year funding for school districts under the approved state EEO plan. Specific yearly program accomplishments should be required and monitored by state EEO personnel. A federal educational office should conduct yearly evaluations of state EEO performance, while the Office for Civil Rights (HEW) would retain responsibility for Civil Rights compliance. b) The extension of multiple year project grants beyond the first project year award should provide for a progressive cost sharing provision. Such a cost sharing provision would provide for a 20% contribution by the local institution or NPO of the total project cost beginning at the fifth year, a 40% contribution during the sixth year, a 60% contribution for the seventh year, and an 80% contribution during the eighth year of receipt of federal funds under ESAA. No grantee would be eligible to receive ESAA funds beyond eight years of program operation.

The separate 8% set-aside state allocation for nonprofit organizations should be deleted and replaced by a provision allowing such funds to be reprogrammed under the basic and pilot set-asides. Language should also be introduced under the authorized activities encouraging school districts to utilize NPO's in providing specific community/school type services under a contractual arrangement.

The "unusually promising and innovative" requirement that now exists under the language of the pilot programs should be spelled out much more fully, or deleted in the Act and in the regulations.

If Title IV of the Civil Rights Act is to continue, it is recommended that a technical amendment to this law provide that the National Advisory Council on Equality of Educational Opportunity, established pursuant to P.L. 92-318, have advisory oversight responsibility regarding the operation and administration of the program authorized under Civil Rights Act of 1964, Title IV.

The Commissioner of Education should adhere to the predetermined dates established for receipt and processing of ESAA applications with more uniformity than has been the case for the past 3 years.

USOE should develop a policy outlining the specific activities that can be provided by nonprofit organizations especially if they are to continue under the present legislative 8% set-aside arrangement. These activities should be limited in scope and show a cost effective relationship as they apply to the administrative overhead of operating such programs.

USOE/EEO should undertake the development and publication of a new set of ESAA program manuals that would be disseminated to both ESAA and prospective ESAA clients. We recommend such guideline manuals be produced for each specific program authorized under the Emergency School Aid Act.

The Office of Education should experiment with the usefulness of a two-part application proposal package. Local education agencies would submit their statistical eligibility and assurance data as a separate section from the actual educational proposal for which they are seeking funds. This would prevent a costly duplication of material in event that said client would have to resubmit their educational proposal.

Severe changes in a panel rated education proposal due to budget negotiations with the Office of Education should be submitted to an internal review panel prior to the issuance of the final award document by USOE. This would insure that said proposal would have attained the score attributed to it by the original nonfederal panel had such proposal been presented in the negotiated form.

Nonpublic schools that are eligible to receive services should be required to submit the necessary statistical and assurance data along with an educational proposal to the public school district from whom they expect to receive educational services provided for under the ESAA funding. Review panelists should be given the opportunity to evaluate the nonpublic schools' request for services as a companion proposal to the school district proposal, regardless of the fact that no points either for or against the public school district would result from such a review.

Monitoring reports by federal and/or state ESAA program officers on all ESAA programs should be made a required part of the proposal review process. This could be done by several means such as a scoring system devised by headquarters and utilized by field personnel with the score being transmitted to the panel or somehow utilized in the final statistical calculations, or by providing the panelists with the formal monitoring reports by program officers. Equitable scoring arrangements should be developed by USOE as new applicants competing for funds would lack such monitoring scores.

ESAA application, receipt, and processing procedures should be reviewed with the intention of providing a different form of competitive levels. Under a state plan framework, the in-state competition for funding could be on the basis of:

A) Nature of Eligibility:
    1) Court ordered desegregation
    2) Voluntary elimination or reduction of racial isolation

B) Size of District:
   1) Large
   2) Medium
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C) Date of Final Phase of Plan:
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Regional offices throughout the country should routinely receive complete samples of all programs currently produced under the ESAA educational television set-aside. Furthermore, USOE regional offices should be regularly supplied with complete program information concerning all applicants for national ESAA funding as well as complete program information throughout the project year on all nationally administered programs within their jurisdictional boundaries.

The U.S. Office of Education should concentrate on developing means to disseminate and promote the programs that are being funded under the ESAA TV portion of the Act. The Commissioner should consider setting aside funds under his discretionary authority for the purpose of developing a national dissemination and promotion campaign for the various ETV programs, or by administratively allowing for more financial support in the dissemination category in individual ETV proposals.

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The Commissioner of Education should insure that the regional offices of said agency are equipped to provide effective technical assistance and dissemination activity for the ETV program. The primary focus at the regional level could be one of helping school districts gear their systems to employ the programs that will be produced by the contracts awarded at the national office.

A further study of the effectiveness of the ESAA ETV program and the accomplishment of the intended purpose, as set forth in the statute, should be undertaken on a national scale.

That there be established a requirement specifying a teacher training component as a counterpart to any specialized math program. This teacher training should be geared toward the utilization of effective techniques with the faculty already at the respective schools within the program.

In order to prevent a self-perpetuating type of special projects behavior from occuring in particular school districts, there should be a requirement through which the school district submits a plan specifying how it intends to incorporate the special math techniques within its present operational structure as financed through its own funding.

An independent national evaluation of the effects of the math program should be undertaken in order to ascertain the cost effectiveness in relationship to other programs funded under the Emergency School Aid Act.

The Commissioner of Education should consider the formula in which the school districts that are participating in the special arts projects would submit a plan specifying a phasing out of the project's activity within the school budget over a period of time.

An evaluation of the cost effectiveness and the impact of the special arts projects should be ascertained as soon as possible.

The Commissioner of Education should expand the Special Student Concerns discretionary program.

The U.S. Office of Education should hold a national two-day conference based on the issues of special student concerns under a desegregated school system no later than June 30, 1977.

The results of the projects that are presently under ESAA funding and the information developed as a result of the national conference should be made available to interested agencies, school districts, and individuals throughout the country as soon as possible.

The Commissioner of Education should allow school officials responsible for the ESAA grant project submitted to the Office of Education for evaluation to be present during the panel evaluation of their application for funds. This departure from the normal operation of the Office of Education in reviewing the ESAA program is justified by the geographical and political uniqueness of the areas such as Puerto Rico, Guam, Samoa, and the Virgin Islands.

The Commissioner of Education should change Section 185.94-1(d) of the regulations which restricts the grantees or prospective grantees under this program to the provisions of Sections 185.12(b), (c), and (d). Again, due to the social, economic, political, and geophysical consideration, the restricting language should be deleted and the applicants allowed to seek more financial aid for planning, minor remodeling, and alteration of facilities than that which is allowed under the 10% ceiling presently in the regulations under Section 185.12.

The transitional features of special projects should be emphasized so that the experimental and/or demonstration aspect of the projects will be highlighted and districts will not begin to feel that these projects have become a way of life for them.

That special projects, excluding ETV, be for limited duration so that they do not become self-perpetuating.

That there is a need for more evaluative activity to be undertaken, especially with regard to the cost effectiveness of the various programs that are authorized to be funded under the umbrella of the Emergency School Aid Act.

The regional office personnel of the Office of Education should be provided with specialized training in order to enable them to give technical assistance in the area of all the various programs under the Special Projects portion of the Emergency School Aid Act. Included also would be an active role in information dissemination of the products currently available under the Emergency School Aid Program, such as the educational television products.

The Commissioner of Education should reappraise on a yearly basis all of the discretionary programs that have been authorized before automatically continuing the program for another year.

RECOMMENDATIONS OF PREVIOUS YEARS

Following are the recommendations that have been transmitted to the Assistant Secretary and to Congress since the establishment of the National Advisory Council. Many of these recommendations have been translated into action by the agency; however, many have not. Responses to all suggestions have been received from the appropriate agency heads responsible for the ESAA program. We feel, however, that at this point in time it is important for us to call attention to all our recommendations so that the new Administration can get a generalized overview of our concerns.

Summary of Recommendations, 1973

RECOMMENDATION A. 1a. The National Advisory Council on Equality of Educational Opportunity requests that in the future it be permitted early and active involvement in any modifications of Emergency School Aid Act regulations.

RECOMMENDATION A. 1b. NACEEO recommends that the Assistant Secretary determine the extent to which the public has sufficient time to advise him about proposed ESAA regulations and, in the event that sufficient time does not exist, suggest appropriate remedial action.

RECOMMENDATION A. 2a. NACEEO requests that in the future it be permitted early and active involvement in the development of criteria for the approval of ESAA applications.

RECOMMENDATION A. 2b. In the event that any school district eligible for ESAA participation is prevented from that participation because it lacks sufficient resources to develop an application, the Bureau of Equal Educational Opportunity should take the necessary remedial action to achieve application parity in this respect.

RECOMMENDATION A. 2c. 1. In the event that some potential ESAA applicants have difficulty in receiving ESAA financial assistance because they have already complied fully with the reduction of minority group isolation and, hence, do not receive eligibility points for same, NACEEO recommends that the application criteria be reevaluated.

RECOMMENDATION A. 2c. 2. An operational definition of "problems incident to desegregation" provided by Congress is needed.

RECOMMENDATION A. 2d. NACEEO recommends that the Assistant Secretary evaluate carefully the structure and function of the Panel Review in the application process, and, in the event that some changes are deemed feasible, initiate the appropriate remedial action for same.

RECOMMENDATION A. 3a. The Assistant Secretary should regularly compile all legal decisions in the field of equal educational opportunity and desegregation. The compilation should be accompanied by an analysis of the meaning of each decision, particularly as it relates to state and local educational administration. The compilation and analysis should be sent regularly to each state educational agency for dissemination to local school districts and other users of the information.

RECOMMENDATION B. 1a. Future legislation should provide specific monies for adequate evaluation of the educational achievement statuses and impacts of programs upon changes in those statuses for each specific minority group identified as a target group in that legislation. In addition, such an evaluation should include data about each sex within such group.

RECOMMENDATION B. 1b. Participants in such evaluative research mentioned in RECOMMENDATION B. 1a. must include evaluation professionals from minority groups.

RECOMMENDATION B. 1c. The Assistant Secretary is requested to give careful consideration to increasing the NACEEO budget to allow for sufficient funds to carry out the activities detailed in NACEEO activities.

RECOMMENDATION B. 1d. Greater emphasis should be placed upon evaluating school curricula and their relationships to occupational and other real life requirements.

Summary of Recommendations, 1974

A. ADVICE TO THE ASSISTANT SECRETARY OF HEALTH, EDUCATION, AND WELFARE

RECOMMENDATION A. 1. The NACEEO recommends that the Assistant Secretary consider initiating further action, where feasible, to implement recommendations of the first interim report of this Council.

RECOMMENDATION A. 2. NACEEO recommends that the pioneering idea of equal educational opportunity Student Advisory Councils be continued and expanded to make their work even more effective.

RECOMMENDATION A. 3. NACEEO recommends that the Assistant Secretary evaluate carefully the feasibility of providing alternative methods of financing all federal equal educational opportunity programs, including the provision of federal block grants to the states.

RECOMMENDATION A. 4. NACEEO urges the Assistant Secretary to promote national educational efforts fostering better understanding of the purposes and uses of valid and reliable testing and evaluation of school systems.

RECOMMENDATION A. 5. NACEEO recommends that the Assistant Secretary study carefully the types of programs that most effectively meet the diverse and specific needs of the seven racial and ethnic minorities named in the Act.

RECOMMENDATION A. 6.a. NACEEO recommends that the Assistant Secretary determine the extent to which historical and sociocultural study units about racial and ethnic minorities are integrated into the public school curricula.

RECOMMENDATION A. 6.b. NACEEO recommends that the Assistant Secretary initiate an evaluation of the educational programs applicable to new entrants to the United States; and recommend educational programs appropriate for their needs. It is further recommended that special attention be given the unique needs of entrants from the Far East.

RECOMMENDATION A. 7. NACEEO recommends that the Assistant Secretary investigate carefully the reasons for the support or opposition to busing and categorize these reasons to provide better knowledge and understanding of those which may or may not be related to racism.

B. REVIEW OF THE EMERGENCY SCHOOL AID ACT OPERATIONS

RECOMMENDATION B. 1. NACEEO recommends continued efforts for improving administration of the Act including providing more direct technical assistance to grant applicants and recipients; assessing the role of review panels; strengthening of local advisory councils; clarifying and supporting student membership roles; introducing forward funding; assessing the effectiveness of nonprofit organizational participation; increasing employment and career ladder development for bilingual professionals and paraprofessionals in programs servicing bilingual students; and providing inservice training for Office of Education personnel prior to and during the administration of ESAA programs.

RECOMMENDATION B. 2. NACEEO recommends continued and adequate evaluation of ESAA, with emphasis upon wider use of randomized controlled field studies designed to assess specific benefits of educational programs and to discover key variables in educational processes. Adequate funding and lead time are crucial for developing such studies.

RECOMMENDATION B. 3. NACEEO recommends that knowledge gained from ESAA evaluations be used and disseminated appropriately.

Summary of Recommendations, 1975

A. ADVICE TO THE ASSISTANT SECRETARY OF HEALTH, EDUCATION, AND WELFARE

RECOMMENDATION A. 1. ESAA's rules and regulations should be revised to promote equity among applicants distinguishable by such factors as size, proportion of minority students, and grantsmanship expertise.

RECOMMENDATION A. 2. OEEO* should continue to improve technical assistance to applicants and grantees.

RECOMMENDATION A. 3. OEEO should monitor carefully the composition, roles, and functions of ESAA funding review panels to assure adherence to regulated criteria and procedures.

B. REVIEW OF THE EMERGENCY SCHOOL AID ACT OPERATIONS

RECOMMENDATION B. 1. In order to reduce the proliferation and overlapping of federal programs, we recommend a comprehensive federal program providing

*Office of Equal Educational Opportunity

state block grants for public elementary and secondary education. As a first step some joint consultation and exploration dealing with federal compensatory/ desegregation funds should be launched.

RECOMMENDATION B. 2. In pursuit of equal educational opportunity for our nation's children, Congress should establish and develop a procedure for determining national educational goals and accountability.

RECOMMENDATION B. 3. Congress should direct the National Institute of Education to develop, validate, and maintain national high school twelfth grade competency examinations and to assist states in the administration and certification of such examinations.

RECOMMENDATION B. 4. Congress should increase its efforts to improve the quality of education for all students. In particular, special emphasis must be placed on improving the educational quality of minority impacted and isolated schools. Inasmuch as desegregation is not the sole remedy, additional remedies for promoting quality education for all children must be pursued vigorously.

RECOMMENDATION B. 5. Priority emphasis must be given to the delivery of high quality education for all elementary school age children regardless of the location of the school. Congress should consider financial assistance by capital grants for new construction or major renovation in order to assure the equitable distribution of quality education.

RECOMMENDATION B. 6. Congress should modify its present restrictions upon the use of federal funds for transportation by providing financial assistance on a matching basis with the states for implementation of court-ordered and/or voluntary desegregation.

RECOMMENDATION B. 7. Congress should promote effective cooperation between the U.S. Department of State and Office of Education for the specific purpose of ensuring adequate educational opportunities for immigrants and refugees, including, where necessary, provisions for bilingual education.

RECOMMENDATION B. 8. Congress should provide adequate funds and sufficient lead time for effective evaluation of federally funded programs for elementary and secondary education, including ESAA, and should promote the dissemination of all relevant data to appropriate groups and agencies.

RECOMMENDATION B. 9. The National Institute of Education should disseminate widely successful public school desegregation and quality education models.

RECOMMENDATION B. 10. Congress should strengthen significantly the roles of state educational agencies in ESAA or its successor.

RECOMMENDATION B. 11. The participation of non-profit organizations (NPO's) in ESAA or its successor should be at the discretion of local educational agencies (LEA's) with appropriately structured appeal procedures.

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Executive Committee:

Chairman -- Mrs. Gwen Awsumb
Executive Director -- Mr. Leo A. Lorenzo
Member -- Dr. Jacquelyne J. Jackson
Member -- Dr. Lawrence Davenport
Member -- Dr. Richard Pesqueira

Evaluation Committee:

Chairman -- Dr. Jacquelyne J. Jackson
Member -- Dr. Haruko Morita
Member -- Dr. Frederick Mosteller

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Member -- Mr. Lyman Pierce
Member -- Dr. T. Winston Cole, Sr.

Staff:

Executive Director -- Mr. Leo A. Lorenzo
Administrative Assistant -- Rosemarie Maynez
Secretary -- Deborah Linderman

DATES AND PLACES OF MEETINGS

January 15	Legislative Committee	San Francisco, California
January 15	Special Projects Committee	San Francisco, California
January 16-17	Full Council	San Francisco, California
February 27	Executive Committee	Washington, D.C.
May 26-28	Full Council	Atlanta, Georgia
June 17-18	Legislative Committee	Dallas, Texas
June 28-29	Legislative Committee	Detroit, Michigan
September 24-25	Full Council	Alexandria, Virginia
November 12	Executive Committee	Memphis, Tennessee

Part II

REPORT OF THE EVALUATION COMMITTEE

NATIONAL ADVISORY COUNCIL ON EQUALITY OF EDUCATIONAL OPPORTUNITY

24 SEPTEMBER 1976

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SUMMARY OF RECOMMENDATIONS

1. The National Advisory Council on Equality of Educational Opportunity should indicate that it appreciates receiving the tentative suggestions for improving pupil achievement as presented in the Year II studies of the Emergency School Aid Act by the System Development Corporation, as well as the discussion of how those suggestions fit with previous research results as described in Chapter VIII ("In-Depth Study") of that report. It is essential to determine if those suggestions, when implemented, would actually improve pupil achievement.
2. The Assistant Secretary of Education, Department of Health, Education, and Welfare, should be requested to organize a new sequence of comprehensively designed and carefully controlled field trials in education to discover whether the suggestions for improvements emerging from the many evaluations conducted by the Office of Education on various distinct Educational Support programs do raise pupil performance.
3. The Assistant Secretary of Education, Department of Health, Education, and Welfare, should be urged to seek funding to design a field study that will oversample minority groups and to execute the design so as to permit relevant descriptions and analyses of the effects of the program on the minority groups named in the Act, and such others as may be appropriate.
4. The National Advisory Council on Equality of Educational Opportunity should consider carefully at this meeting of 24 September 1976, whether or not the Emer-

gency School Aid Act in its present form should be continued, modified, or disbanded, and, if it still feels that the most appropriate method of funding should be that of educational block grants to the state (as previously recommended by the Council), it should also consider the most appropriate ways for funding school districts which would permit the experimentation suggested in the previous recommendation from this Evaluation Committee.

5. The National Advisory Council on Equality of Educational Opportunity should urge its Chairman to request that the Assistant Secretary of Education, Department of Health, Education, and Welfare, provide the Council with a copy of an Emergency School Aid Act-funded study of the exemplary desegregated schools and an evaluation of the determinants of success performed by the Educational Testing Service (OEC-0-73-6341).

THE REPORT

The National Advisory Council on Equality of Educational Opportunity (hereafter, NACEEO) was specifically mandated under the Emergency School Aid Act (ESAA, Public Law 92-318) in June, 1972. The major intent of that Act was to provide financial aid to meet the special needs incident to desegregation, and to reduce the isolation (or at least its consequences) of minority group faculty and students in public elementary and secondary schools throughout the United States. Such financial aid would benefit local educational agencies facing court-ordered desegregation. It could also encourage more voluntary desegregation by school districts. The major responsibility of NACEEO was to oversee in an advisory capacity the administration and operation of ESAA. A final report

about the program is to be forwarded to Congress.

At its inception in 1973, NACEEO established an Evaluation Committee.[1] Its members are Drs. Jacquelyne Jackson (Chairman), Haruko Morita, and Frederick Mosteller. The Committee appreciates the assistance it has received from remaining NACEEO members and staff, from various personnel of the Office of Education (OE), from the System Development Corporation (SDC), and from the staff of the National Assessment of Educational Progress (NAEP).

The three major tasks of the Committee during its first few months were (1) the acquisition of knowledge about and sufficient understanding of the contractual agreement between OE and SDC for evaluating ESAA; (2) the development of some recommendations which, in the judgment of the Committee, might aid in that evaluation; and (3) a critique of the major evaluation of the Emergency School Aid Program (ESAP), ESAA's predecessor, with particular emphasis upon the validity and reliability of the finding about the significant achievement gains by the tenth-grade black males. NACEEO requested a reevaluation of the ESAP data. OE consented. Rand Corporation performed the reanalysis, generating several new hypotheses. Though unexplained, it left standing the black male gain.

The Committee applauded OE plans to evaluate ESAA output in part by using an experimental research design. OE broke new ground by following for ESAA the experimental approach used in ESAP. Genuine experiments in education are rare. Rarer still are those of national or even regional scope. But all the hopes of the Committee and OE cannot be fulfilled by one such study.

At the other end of the scale, the Committee was concerned because the evaluation was restricted to the Basic and Pilot Programs; because no plan was made to

obtain data about all of the minority groups specifically mentioned in the Act; and because minority professionals were generally not involved at the onset in the decision-making processes pertinent to the evaluation study.

The Committee studied carefully The First Year of Emergency School Aid (ESAA) Implementation (SDC, 1975). It raised pertinent questions about the document during NACEEO meetings, and in individual or group sessions with Dr. John Coulson, Principal Investigator, and Dr. Michael Wargo, then the OE Project Officer. The Committee discovered that some external difficulties had affected the investigation. For example, the Committee recognized the need for sufficient lead-time in developing evaluation studies prior to program onset. But, sufficient lead-time is difficult to achieve in the face of the Congressional timetable. The Committee found that considerably increased funding would be required to design a way to oversample minority groups small in size, and to execute the design so as to permit relevant descriptions and analyses of program effects upon these groups. The Committee also recognized the ill effects upon the reliability and validity of sampling and data collection when some local educational agencies failed to cooperate fully, and when some sample units present in Year I were not refunded by ESAA in Year II.

From time to time, the Committee made appropriate recommendations to the Council about issues related to program evaluation. Those recommendations approved by the Council in the original or the modified form appear in the three Interim Reports already issued by NACEEO.

In March, 1976, the Committee reviewed carefully the initial drafts of the reports covering the cross-sectional data for Year II and longitudinal data for

Years I and II prepared by SDC. The Committee also formulated recommendations designed to improve those reports in their final stage, and presented them to SDC.

Since then, the Committee has studied carefully the final reports covering the cross-sectional and longitudinal data available in Year II, and the in-depth studies undertaken in 1974-1975. One of the Committee members also completed an extensive study of the literature about desegregation and evaluation studies. In addition, the Committee obtained the consulting services of a statistician, Dr. William P. Cleveland of Duke University.

The Committee believes considerable progress can be made by building on the findings of previous studies. NACEEO could be most helpful to OE and to Congress by providing recommendations which, if enacted, would enhance the effectiveness of evaluation studies of future educational programs. These recommendations would enable OE to obtain the greatest benefit from the data already collected about ESAA during its first three years of existence and would aid NACEEO itself in formulating more cogent answers to the basic question of "Does ESAA work?"

Thus, the purposes of this report of 24 September 1976 are those of (1) providing NACEEO with a summary statement about the findings of desegregation studies and about the quality of the evaluation undertaken by SDC in comparison with other evaluations of educational programs; (2) presenting verbatim the report of the independent consultant about the reports issued by SDC for Year II of ESAA; and (3) providing NACEEO with some recommendations for consideration for action which were developed by the Evaluation Committee.

Summary statement: desegregation and evaluation studies. The Committee Chairman's review of various studies of public school desegregation, as well as the

excellent review of a number of such studies completed by Nancy St. John in her School Desegregation: Outcomes for Children (Wiley Interscience, New York, 1975), indicate clearly that the findings are fragmented and inconclusive. Most of the studies have concentrated upon measures of achievement in reading and mathematics, but few have utilized national samples. The most recent national survey by NAEP (as set forth in the NAEP press release dated 21 September 1976) shows an upturn in reading performance. The upturn for nine-year old black children was dramatic. Not an experiment, this survey measures changes over a four-year period.

The most novel--and, perhaps, the most promising--research design has been that contained in the ESAA evaluation.

The field of evaluation research itself is relatively new. Considerable disagreement about the most appropriate methodologies to utilize in evaluation abound. One of the most interesting controversies may be found in the reanalysis of the "Sesame Street" data. It was found that the programs did improve the performance of the children. Since children from all socioeconomic and ethnic groups watched the programs, the gaps between the groups were not closed. The controversy is not about these facts, but if it is socially desirable to fund an educational procedure which improves performance, but does not close the ethnic and socioeconomic gaps in performance. In fact, the procedure may even widen those gaps.

Many persons and groups fear evaluations for different reasons. Many internal program evaluations are suspect because they lack scientific rigor and are frequently biased to support program continuation, which, of course, is frequently linked to vested interests.

Further, the goals of federally-funded evaluation studies of federally-funded educational programs overlap considerably, as in the case of evaluations of ESAA and the Elementary and Secondary Education Act. Greater effort should be made to reduce unnecessary overlap, with a view to reducing the "overtesting" of public school students merely for purposes of evaluation. We note that the sampling approach used by OE reduces vastly the amount of needed testing.

Despite the problems still attendant upon major evaluation studies, the approach to the evaluation of ESAA seems definitely superior to many other evaluations of educational programs within the public schools. Its approach through experimentation, its emphasis on outp[illegible], and its sampling operation all recommend it.

We turn now to a major difficutly that is not peculiar to ESAA, but is a feature of any program where multiple funding sources are available. The evaluation of ESAA is ineffective in measuring the effectiveness of the Act because conditions cannot be controlled sufficiently by the contractor nor by OE. It may not be desirable for such control to be exerted. Thus, new approaches may be needed. In short, much more attention must be given by Congress and the agencies to establishing ideal conditions for such social research and evaluation. The public must also be educated to the need for and value of cooperation with evaluation studies which will provide important data about the effectiveness of given programs, as well as about the causes of success or failure in the achivement of desired social gains.

The National Evaluation of the Emergency School Aid Act (ESAA): Summary of the Second-Year Studies (SDC, 1976) provides some information about the characteristics and findings of the study. It is elsewhere available for those interested in it.

The Appendix attached to this report provides a report by the independent con-

sultant, who reviews, discusses, and questions some major points in the SCD reports. That report gives NACEEO, the Evaluation Committee, and SDC a fresh look at a new set of questions about the most recent evaluation. These questions could be discussed profitably. Some of his points relate closely to the recommendations of the Evaluation Committee to which we now turn.

Recommendations from the Evaluation Committee to the Council. The following recommendations were presented to and approved by the Council on 24 September 1976, accompanied by a request that the Council be responsible for their dissemination to appropriate persons or agencies. In most instances, justifications for the recommendations are also provided.

1. The Evaluation Committee believes that the Council should take a position with respect to the ESAA Year II studies.

THEREFORE, WE RECOMMEND that Council should indicate that it appreciates receiving the tentative suggestions for improving pupil achievement as presented in the Year II studies of the Emergency School Aid Act by the System Development Corporation, as well as the discussion of how those suggestions fit with previous research results as described in Chapter VIII ("In-Depth Study") of that report. It is essential to determine if those suggestions, when implemented, would actually improve pupil achievement.

2. The Evaluation Committee believes that the Assistant Secretary of Education should be requested to implement the aforementioned newly-designed field studies.

THEREFORE, WE RECOMMEND that the Assistant Secretary of Education, Department of Health, Education, and Welfare, should be requested to organize a new sequence of comprehensively designed and carefully controlled field trials in education to

discover whether the suggestions for improvements emerging from the many evaluations conducted by the Office of Education on various distinct Educational Support programs do raise pupil performance.

The justification for this recommendation is important. The ESAA evaluation produced a significant finding in its Year I Studies, which was backed by the Year II Studies. Specifically, school districts can and apparently do adjust their allocation of other Federal and State programs among the various schools so that participating and control schools differ little in expenditures for ESAA-related activities. Although this flexibility has merits for the districts, it reduces the findings of the effects of various program activities from the status of strong evidence supported by a randomized field trial to that of suggestions developed by an observational study.

As an instance, many suggestions from the Year II Studies may contain important consequences for educational practice in desegregating school districts in particular, and teaching in general. These suggestions include such ones as those showing that (1) parental aides in the classroom, and not other sorts of aides, improve the performance of pupils; (2) recency of the training of the teachers strengthens the pupil performance; and (3) indiscriminate praise does not raise pupil performance. But, as they stand, these are findings based on observation studies, and not controlled field studies.

The fact that a randomized field trial was being carried out at the same time as these findings emerged should not confuse us into assuming that the ESAA study set up participating programs to have parental aides and nonparticipating programs not to have parental aides as an educational treatment. Consequently, we cannot

have much confidence that if the use of parental aides were encouraged, achievement scores would rise. Similar remarks apply to the other suggestions emerging from the study.

The essential points are that the activities listed are selected from the many possible ones as those that look promising, but they have not been imposed by the investigators. Thus, we have some evidence that these variables are associated with success in programs, but we have little evidence that if other programs applied them, they would succeed. Every year, some of the hundreds of possible variables will accidentally be associated with successful performance without necessarily being part of the cause of success. Even if a variable repeats another year, the evidence is not solid that when it is imposed, it causes or is likely to cause improvement.

The question which can arise readily is "Why not just let school districts try out these suggestions and see what happens?" The answer is, first, that it is all right for districts to try them out; but, secondly, that we will not find out what happens. If improvement occurs, it may be due to district characteristics making such changes acceptable. The same argument applies to failures. If these suggestions are improvements, we need to estimate their quantitative value. Suggestions are easy to come by, but expensive to pay for, if, for no other reason than doing one thing precludes doing its opposite.

The general idea is that when one wants to see if changing something about a complex system will improve the output, one has to change it and see what happens. (Seeming exceptions do arise in well-understood physicial science systems, but even for those, theoreticians have often been disappointed. And we must remember

the tens of thousands of investigations that have led to their present state. Few would argue that we have anything comparable to the theory of exterior ballistics or the theory of simple electrical networks for the field of education.) We can believe that if a difficult subject is taught in a society, few will learn it. Our problem, however, goes the other way. We are already teaching certain difficult subjects, e.g., mathematics, reading, and respect for the dignity and rights of others. Although we are having some success, we want more at a reasonable cost. This is the sort of activity that well-trained quality control engineers struggle with in industry under highly controlled conditions, with physical theory at their command. It is not surprising then if it is hard in the field of education where knowledge and control of the variables and the theory of the process are weak. But merely because something is extremely difficult does not mean that we should not strive to conquer it.

These considerations lead us neither to a criticism of the Year II analysis, nor to complaints in any substantive fashion about the design of the original field trial. Instead, we have a set of important suggestions developed from this study. We have also found that the current field trial cannot tell us if the important suggestions from this study are likely to hold up. And, we see that we must recognize them as only suggestions (hypotheses, to be more formal), attractive though they are.

These and other ideas need to be tested to see if and when they work, and they cannot be tested in the framework of the current study. The Year II Study, if it supports these suggestions, would strengthen them a bit, but still would not answer the crucial questions. Thus, it is essential that some agency take steps beyond evaluating the programs as they stand and investigate possible activities

that cause better performance. To do this will require considerable imagination, funds, fortitude, and political acumen, as we have hinted previously.

It will be necessary for Congress, the Administration, and educators to understand the need for further better controlled studies. They need to understand both the strengths and weaknesses of the work already carried out. They need also to understand that the purpose is not to reject or enlarge programs. Instead, the hope is to evolve improved programs based upon stronger studies. It will also be important, once again, to enlarge considerably the general public's understanding of the purpose not only of evaluation studies, but of field studies as proposed herein.

The concern may be expressed that there is neither time nor money for better studies. If there is time and money for programs whose value is uncertain, then there ought to be time and money for evalutions that are oriented to improving these programs, and particularly so for those which are quite costly. Moreover, we know that poorly controlled studies are not likely to improve our knowledge. The Federal Government has funded many such studies on both short and long-term bases, and we have learned little from them. But one finding stands out especially: we should not expect large gains from any particular attempt at improvement; we have not had them, and we have had many tries; this means that we need well-controlled investigations of a quality and size that can detect small gains of the order of five to twenty percent. A few gains of this size would be worth a lot, but it takes strong investigations to detect reliable gains of this magnitude.

We must also appreciate gains when they occur. If a pupil gaining knowledge at a rate of about 0.7 of a grade per year were somehow raised to 0.8, our atti-

tude initially should be that a 14 percent gain is a lot. The pupil is still losing 0.2 per year, compared to the average. But that is 33 percent less than was lost before.

When we speak of some agency needing to take on these further studies, we think of the Office of Education, of the National Center for Educational Statistics, or of the National Institute of Education, as well as the possibility of interagency cooperation. OE has shown that it can design valuable experiments. We do not know if it can go beyond its present designs within the framework of its current charge, but some agency needs to do so.

Assume that a plan for research in educational improvements is desirable. What, then, should be studied? A review of the many studies of compensatory and desegregation programs could create a large research agendum. Inevitably, many suggestions will appear. A strong research team would be required to develop a research program to take advantage of this previous work. An essential feature of the program would be to give highest priority to the study of the effect of variables that can be adjusted through policy decisions. This does not mean that variables such as sex or ethnicity cannot play important roles, but they have to be studies in interaction with variables that can be adjusted by policy.

3. The Evaluation Committee is, nevertheless, aware of the need to obtain significant data about minorities to supplement that already available.

THEREFORE, WE RECOMMEND that the Assistant Secretary of Education, Department of Health, Education, and Welfare, should be urged to seek funding to design a field study that will oversample minority groups and to execute the design so as to permit relevant descriptions and analyses of the effects of the program on the

minority groups named in the Act, and such others as may be appropriate.

The justification for this recommendation includes the fact that knowledge about the differential effects of educational programs upon specific subgroups of the affected population can aid in the development of more effective programs for delivering educational services to them.

4. The Evaluation Committee has been seriously concerned about insufficient direction given to ESAA grantees for internal program evaluation. A limited investigation of this problem suggested the need for more effective evaluations on the regional and local levels. But, in light of the findings of the Year II Studies, the Committee believes that it is more important to emphasize the need for prior consideration of the existing system of Federal funding for public elementary and secondary education. This is a big task. Nevertheless, the recommendation applicable to this Council follows.

THEREFORE, WE RECOMMEND that the Council should consider carefully at this meeting of 24 September 1976, whether or not the Emergency School Aid Act in its present form should be continued, modified, or disbanded, and, if it still feels that the most appropriate method of funding should be that of educational block grants to the state (as previously recommended by the Council), it should also consider the most appropriate ways for funding school districts which would permit the experimentation suggested in the previous recommendation from this Evaluation Committee.

5. The Evaluation Committee is still concerned about the lack of evaluation of ESAA-funded projects other than the Basic and Pilot Projects. We are aware of some plans to evaluate other ESAA components, such as that of the nonprofit

groups. Given the need for considerable modifications of current research programs, consideration should now be given to the need for or the possibility of evaluating these programs now. In addition, the Committee has not been able to obtain a copy of an ESAA-funded evaluation study. The recommendation below is geared to the acquisition of the report of that study.

THEREFORE, WE RECOMMEND that the National Advisory Council on Equality of Educational Opportunity should urge its Chairman to request that the Assistant Secretary of Education, Department of Health, Education, and Welfare, provide the Council with a copy of an Emergency School Aid Act-funded study of the exemplary desegregated schools and an evaluation of the determinants of success performed by the Educational Testing Service (OEC-0-73-6341).[2]

6. The Evaluation Committee also believes that forward planning by the Council is desirable. There are a number of tasks possible for this Committee, the execution of some of which will require additional staffing and funds. Specifically, continued monitoring seems a natural task. It is the primary source of information to the Council about ESAA program outputs. An assessment of the contributions of nonprofit organizations to ESAA could be handled by the Committee, by "farming out" a study, or by recommending to OE that such a study be undertaken. At this time, we lack information about OE's activities in this direction. The review of administration procedures under ESAA is a good job for the Council. It should also be "farmed out." The Committee, with sufficient support, could handle a study of the composition of local citizen advisory councils.

A study of the activities and overlaps of critical educational programs is a task best suited for NACEEO, OE, or GAO. One feature that strikes hard at our

job is that fund overlapping made it impossible to determine the value of the ESAA funds for improving education. Fund overlapping has also destroyed essentially the value of the randomized controlled field studies OE so carefully put into the field insofar as they are randomized rather than observational studies. The reason is that the treatment (i.e., an ESAA-supported school) is mixed up with other treatments, such as those supported by Title I funds. The complaint here is not that the funds are available or used, but that it is not possible when funds can be so traded to evaluate their impact.

The evaluation of OE monitoring of ESAA is a valuable job. Although it extends far beyond the capacities of this Committee, the Committee could play a considerable role in on-site reviews. A critical question, however, is the extent to which a good study of this kind would not have to be a substantial supplement to current OE evaluation activities.

In any case, the Evaluation Committee has considered critically types of roles which it could best play in conforming to the Council's mandates under the Act.

Conclusion. The major purpose of this report was to present to Council the Evaluation Committee's assessment of the key implications contained in the Year II Studies of ESAA by the System Development Corporation, and of the critique of those Studies by an independent consultant. The most important conclusion reached by the Committee is the need for comprehensively designed and carefully controlled field trials in education to determine if the suggestions for improving pupil performance contained in many evaluations conducted by or on behalf of OE on various distinct Educational Support programs do, in fact, raise pupil performance.

The Evaluation Committee urged the Council to take action on its report, in-

cluding follow-up action suggested by the recommendations of the Evaluation Committee which were approved by the Council. The five recommendations set forth earlier in this report were approved in their original form or with modifications, on 24 September 1976. The NACEEO Chairman indicated that she would follow through, where appropriate, in acting upon these recommendations. Subsequent action upon the recommendation concerning the request for a copy of the ETS report resulted in receipt of said report. The NACEEO Chairman also determined that this report of the Evaluation Committee of 24 September 1976 would be released in the March report of the Council, and it is, therefore, submitted for that purpose.

RESPECTFULLY SUBMITTED:

Jacquelyne Jackson

JACQUELYNE JACKSON, CHAIRMAN

Haruko Morita

HARUKO MORITA

Frederick Mosteller

FREDERICK MOSTELLER

(On the 24th of September, 1976, at Alexandria, Virginia)

Footnotes

[1]In November, 1976, under the reorganization plan set forth by the second NACEEO Chairman, the Evaluation Committee was changed to the Evaluation Task Force. Its membership continued unchanged.

[2]A copy of the report prepared by the Educational Testing Service was received several months after the 24 September 1976 meeting. It was not specifically related to an evaluation of the ESAA-funded projects.

APPENDIX

CONSULTANT REPORT

by

WILLIAM P. CLEVELAND

BACKGROUND

This report contains the reactions of an independent statistician to the results of the Year II analysis of ESAA. These results are contained in three publications by SDC: National Evaluation of the Emergency School Aid Act: Summary of the Second-Year Studies; The Second Year of Emergency School Aid Act Implementation; and An In-Depth Study of Emergency School Aid Act Schools: 1974-75.

Any conclusions drawn from the evaluation of ESAA conducted by SDC are of sufficient importance to warrant careful examination. Dr. Jacquelyne Jackson (Chairman, Evaluation Committee, NACEEO) felt that she could present a more informed report to NACEEO with the reactions of an independent statistician in hand. I have read the documents cited and present this report to her and to the Council.

The report proceeds in the following sequence. Conclusions about the evaluation and its findings are presented first. The next section provides a perceptual and situational context from which ESAA and its evaluation can be viewed for the purpose of explaining why the conclusions are so tenuous. The third section makes comments upon specific conclusions and on the evaluation design.

CONCLUSIONS

The overall design and implementation of the evaluation of ESAA was, in my opinion, quite good. The sample was carefully selected, factors which might

have affected performance were included in the study to the extent one could reasonably expect, and the statistical analysis was complete and based upon thoughtful consideration of the measures employed. Although some specific suggestions about design and analysis are made below, these may have been considered by SDC and deemed inappropriate or not useful based on the situation or the data.

The conclusions highlighted in Summary of the Second-Year Studies must be viewed with some reservations. This evaluation was appropriately exploratory in nature and a great many statistical tests were performed. Thus, one would expect a certain number of results to be statistically significant, especially with a 10 percent chance of rejecting the null hypothesis when true. Since the study was exploratory, the results one chooses to emphasize will reflect prior opinions on what results are useful or make sense. A comparison of the summary document with the two more extended ones reveals such a selection. The most positive finding in the summary is that 75 percent of the Basic elementary and Pilot schools maintained or improved their position relative to national rankings in math, based on Table IX-14 in the Second Year of ESAA Implementation. This figure reflects a 50 percent probability of this event for each school. If the criterion is increased to 90 percent probability that improvement took place, the fraction satisfying the criterion falls to 40 percent. For the same sample groups, the summary support includes the fact that school climate indicators improved where students liked school and perceived teachers as supportive. The relation that more individual guidance led to less favorable student measures of student-teacher interaction was omitted.

Though "selection effects" are present in the summary document, I believe it is a reasonable summary of information derived from the study which would indicate where to spend money if money is to be spent. The expanded documents also largely satisfy the goals of the evaluation of documenting student needs and district resource allocations. I do not think the study could be used to prove that money should or should not be spent in this way.

FACTORS AFFECTING THE OUTCOMES

The essence of the situation in which this study is taking place is largely captured by three facts: performance on scholastic achievement tests is related to socioeconomic status (SES ; expenditures on education vary with SES: and minority groups tend to fall in the lower SES brackets. In reading the evaluation documents, one is forced to think about what the reasons for the poorer performance of lower SES groups might be, whether ESAA would alter these, and whether the evaluation would detect any performance gains or factors leading to improved performance.

Some reasons given for performance variations are:

a) SES reasons: amount of parental help, home resources, expectations, and attitudes toward school.

b) Financial reasons: amount of money spent in schools.

c) Ethnicity poses special problems in addition to those in a) and b).

d) Basic ability of students.

Factors relating to a) and b) were measured in the study. No direct measure of problems associated with c) were made, except some consideration of bilingual instruction. The approach was that integration, special instruction,

and counselling of both students and teachers would remove whatever problems existed. No measures of basic ability were made. This is not my field, but my impression is that no such measures exist which are independent of skills and cultural norms.

What could ESAA hope to accomplish? The SDC evaluation indicates that integration had largely come about prior to the awarding of grants within the ESAA-funded districts. Hence, the degree of integration during the study period did not change much. It was not clear from the documents whether schools with increased integration also had a better SES mix. This effect and exposure of minorities to better facilities should be documented and not assumed if they are considered important aspects of integration. Since the amount of money awarded was not large in proportion to total school budgets and was committed only a year at a time, most of its effect had to be in providing supplementary resources and activities. Some evidence that this was so is found in factors relating to math achievement gains.

Why did the evaluation fail to find large improvements or consistent significant causes of improvement? The SDC evalution rationalizes the small differences between treatment and controls groups largely in terms of equality of resources. Though ESAA funds were withheld from control schools, other funds were available. Data on comparable non-ESAA districts are not presented, but I would expect the same funding sources available to control schools were available to them. This would have considerable effect on improvements in percentile rankings.

It seems to me that this situation is always likely to be present. In medical studies, one can ethically withhold a drug not yet proven effective

from a control group. It is much more difficult to justify withholding money from a control group. Money is assumed to be effective until proven otherwise, and the denied group contains taxpayers who have some rights to the money. Perhaps designs based on equal money allocations to different districts to do randomly assigned treatments could be worked out.

Most of the findings in the SDC's evaluation of ESAA come from relational analyses. Some were in the total sample, and some were in the In-Depth Study. The only ones with $\alpha = .01$, however, were that math and reading gains were related to teachers' use of instructional objectives. This was also one of the few findings that held for both reading and math. Other findings varied in interpretability and in consistency. This makes it difficult to know how seriously to take them, especially in view of the large number of tests. Unfortunately, consistency of Year I and Year II results was also low.

Was this scattered pattern of results inevitable? Perhaps not. But the evaluation design was not optimal from the relational viewpoint. I suspect the design was aimed primarily at treatment-control comparisons. The entire sample is drawn from ESAA eligible districts, and schools of greatest need within these. Thus, schools in which students perform in the upper percentiles were never examined.

In studying relations among variables, values at both ends of the range are quite important. Examination of only a portion of the variable range tends to lead to no relation and may give a quite different relation than the

entire range. We know what the ESAA schools were spending. What were their competitors for percentile rankings spending? What teaching techniques were being used? Are student evaluations of school climate different elsewhere?

In performing such a broad study, one would have to control for SES. One would also have to establish that achievement scales worked about the same in different ranges to analyze gain scores. Does a person at the 70th percentile have to gain more or less to maintain her or his rank than a person at the 20th percentile.

An attempt at an absolute benchmark for improvement was made by relating gains achieved to those necessary to maintain percentile rank. However, this comparison of a small group with a larger group falls considerably short of what one would like. There will always be a top ten percent and a bottom ten percent by definition. Presumably, if even the bottom ten percent did "well," a satisfactory situation would prevail. Is there or could there be a definition of "well?" Could there be a criterion of the range between the 10th and 90th percentiles? Of course, it is also necessary to remove ethnic variations in achievement distributions to the extent possible, but progress in an absolute sense would still be progress.

As to the chief complaint of statisticians, sample size, I do think the In-Depth portion of the evaluation was somewhat handicapped by including few schools. Differences between subsamples from 24 schools must be pretty large to be significant. On the other hand, extending the evaluation over several years to allow for replication seems to me a better use of money than increasing sample sizes to get statistical significance of trivial differences.

SOME SPECIFIC COMMENTS

On page 7 of the summary document, it is stated that performance of non-minority and minority students was more similar in minority isolated (Pilot) elementary schools. Though a causal relation is not claimed, it is not made clear whether this finding is related to a more similar pattern of SES or not. In the discussion of praise on page 17, tendencies (statistically non-significant relationships) of praise to be correlated with psycho-emotional goals and less practice time are cited. A similar tendency for praise to be associated with lower teacher expectations for students was omitted. For reasons which are not clear, teacher expectations were positively, significantly correlated with achievement.

It is difficult to evaluate the conclusion on page 21 about the relation of reading gains to desegregation. A more expanded discussion appears on page X-15 of The Second Year of ESAA Implementation. Specific figures are not cited, and one wonders why reading only was affected.

Finally, an analytical point. The dependent variables relevant to academic achievement in the In-Depth Study were dichotomized in generating successful and nonsuccessful categories of schools. Given the nature of the scales, particularly on the independent side, the analytical procedures were reasonable. However, one would like to know how sensitive the conclusions are to the techniques used. Specifically, one could feel more comfortable with the conclusions knowing raw gain scores or adjusted gain scores were also used on the dependent side as in the other analyses.

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U.S. Office of Education
Bureau of Elementary and Secondary Education
Equal Educational Opportunity Programs

Obligational Authority for Desegregation Assistance
Fiscal Years 1965-1977

Fiscal Year	Title IV*	ESAP**	EEAA***	Total
1965	$ 8,000,000	$ -	$	$ 8,000,000
1966	8,000,000	-		8,000,000
1967	8,028,000	-		8,028,000
1968	10,000,000	-		10,000,000
1969	10,750,000	-		10,750,000
1970	19,036,000	-		19,036,000
1971	19,218,000	75,000,000		94,218,000
1972	19,672,000	75,000,000		94,672,000
1973	21,700,000	21,000,000	227,940,000	270,640,000
1974	21,700,000	-	236,493,000	258,193,000
1975	26,700,000	-	215,000,000	241,700,000
1976	26,700,000	-	245,000,000	271,700,000
1977	34,700,000	-	240,000,000	274,700,000
TOTAL	$ 234,200,000	$171,000,000	$1,134,433,000	$1,539,637,000

* TITLE IV CIVIL RIGHTS ACT - 1964: Technical assistance awards are made to: (1) general desegregation assistance centers; (2) State educational agencies; (3) local educational agencies; and (4) universities for training institutes.

** EMERGENCY SCHOOL ASSISTANCE PROGRAM: was to meet special needs incident to the elimination of racial segregation and discrimination among students and faculty in elementary and secondary schools by contributing to the costs of new or expanded activities - designed to achieve successful desegregation and the elimination of all forms of discrimination in the schools on the basis of students or faculty being members of a minority group.

*** EMERGENCY SCHOOL AID: is to provide financial assistance (1) to meet needs incident to the elimination of minority group segregation and discrimination among faculty and students in elementary and secondary schools; (2) to encourage the voluntary elimination, reduction, or prevention of minority group isolation in elementary and secondary schools with substantial proportions of minority group students; and (3) to aid school children in overcoming the educational disadvantages of minority group isolation.